

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

CONFERENCE OF PRESIDENTS OF  
MAJOR ITALIAN AMERICAN  
ORGANIZATIONS, INC.

and

PHILADELPHIA CITY  
COUNCILMEMBER MARK F. SQUILLA

and

THE 1492 SOCIETY

and

JODY DELLA BARBA

and

GRAND LODGE OF PENNSYLVANIA,  
SONS AND DAUGHTERS OF ITALY

*Plaintiffs*

v.

CITY OF PHILADELPHIA

and

MAYOR JAMES F. KENNEY

*Defendants*

Case No. 2:21-cv-01609

**JURY TRIAL DEMANDED**

**COMPLAINT OF INTERVENOR**  
**GRAND LODGE OF PENNSYLVANIA, SONS**  
**AND DAUGHTERS OF ITALY**

1. The allegations of paragraphs 1 through 14 of Plaintiffs' Complaint are incorporated by reference as if fully set forth herein.

2. Intervenor, Grand Lodge of Pennsylvania, Sons and Daughters of Italy (the "Grand Lodge") is a Pennsylvania Corporation organized and incorporated in 1913, and has been in existence continuously since that date. It is the oldest and largest fraternal organization of Italian American organizations in the Commonwealth of Pennsylvania. Its office and place of business is located at 1518 Walnut Street, Suite 1410, Philadelphia, PA 19102.

3. The allegations of paragraphs 19 through 189 are incorporated by reference as if fully set forth herein.

4. The By-Laws of the Grand Lodge provide in Article 418:

**"OFFICIAL HOLIDAY OF THE GRAND LODGE AND OFFICIAL COLOR OF THE ORDER**

To commemorate the anniversary of the discovery of America by Christopher Columbus, the Grand Lodge proclaims the second Monday in October of each year as the OFFICIAL HOLIDAY OF THE ORDER.

Since the discovery of America by the Italian navigator, who divined the event and blazed his way to its realization, is a milestone in the history and progress of mankind, the Grand Lodges and the lodges of the Order shall celebrate such anniversary each year in a solemn and dignified manner, worthy of the outstanding achievement and greatness of Christopher Columbus"

5. Thus the commemoration of Columbus Day is the official holiday of the organization and evolved as a celebration of the accomplishments of Italian Americans in this Country, and was marked by the United States and the Commonwealth of Pennsylvania declaring it as a holiday.

6. The Mayor and City's removal of the celebration by declaring it a non-holiday in favor of another ethnic group is divisive, racially discriminatory and biased with the Italian American population and those who have descended from the original immigrant class, and makes it impossible for the Grand Lodge to comply with its By-laws.

7. This Mayor and City with this action coupled with what occurred several months ago by labeling the protectors of the statue of Columbus which stands in Marconi Plaza claiming that those who were protecting the statute from damage and destruction by an unnamed and unprincipled mob in the midst of other rioting and calling these protectors of the statute “aggressors” is a continuation of the original bias against Italian Americans by covering the statute when an offer was made to and refused by Mayor Kenney to provide a protective glass shield and a security system to secure it from destructive outside intrusions.

8. The Claims for Relief are incorporated by reference as if fully set forth herein..

Respectfully submitted,

/s/ Francis Recchuiti

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